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VIA ELECTRONIC FILING

The Honorable Sue L. Robinson
U.S. District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, Delaware 19801

***Re: International Business Machines Corporation v. Groupon, Inc.,
C.A. No. 16-122-SLR***

Dear Judge Robinson:

Plaintiff International Business Machines Corporation respectfully requests that the above-referenced action be reassigned to Chief Judge Leonard P. Stark, who is currently presiding over C.A. No. 15-137-LPS, which is a related matter. The same patents are being asserted in both civil actions. Counsel remain available at the Court's convenience if Your Honor has questions.

Respectfully,

/s/ David E. Moore

David E. Moore

DEM:sjh/1218416/43155

cc: Clerk of Court (via hand delivery)